

Sean A. O'Neal  
Luke A. Barefoot  
Jane VanLare  
Thomas S. Kessler  
CLEARY GOTTlieb STEEN & HAMILTON LLP  
One Liberty Plaza  
New York, New York 10006  
Telephone: (212) 225-2000  
Facsimile: (212) 225-3999

*Counsel to the Debtors  
and Debtors-in-Possession*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

Genesis Global Holdco, LLC, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No.: 23-10063 (SHL)

Jointly Administered

**Related Docket Nos. 1120, 1167, 1187,  
1193, 1406, 1565, 1590**

**NOTICE OF FURTHER  
ADJOURNMENT OF DEBTORS'  
EIGHTEENTH OMNIBUS OBJECTION  
(NON-SUBSTANTIVE) TO CERTAIN CLAIMS PURSUANT  
TO 11 U.S.C. § 502 AND FED. R. BANKR. P. 3007 (CO-LIABILITY  
CONTINGENT) SOLELY WITH RESPECT TO CLAIM NOS. 375, 398 AND 408**

**PLEASE TAKE NOTICE** that, on January 19, 2023, Genesis Global Holdco, LLC and its debtor affiliates, as debtors and debtors-in-possession in the above-captioned chapter 11 cases (collectively, the “Debtors”), each filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101 *et seq.* with the United States Bankruptcy Court for the Southern District of New York.

---

<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's tax identification number (or equivalent identifier), are: Genesis Global Holdco, LLC (“Holdco”) (8219); Genesis Global Capital, LLC (“GGC”) (8564); and Genesis Asia Pacific Pte. Ltd. (“GAP”) (2164R). For the purpose of these Chapter 11 Cases, the service address for the Debtors is 175 Greenwich St., Floor 38, New York, NY 10007.

**PLEASE TAKE FURTHER NOTICE** that, on or about May 19, 2023, proof of claim number 375 (“Claim No. 375”), proof of claim number 398 (“Claim No. 398”), and proof of claim number 408 (“Claim No. 408,” and together with Claim No. 375 and Claim No. 398, the “Moro Claims”) were filed in these Chapter 11 Cases.

**PLEASE TAKE FURTHER NOTICE** that, on January 2, 2024, the Debtors filed the *Debtors’ Eighteenth Omnibus Objection (Non-Substantive) to Certain Claims Pursuant to 11 U.S.C. § 502 and Fed. R. Bankr. P. 3007 (Co-Liability Contingent)* (ECF No. 1120) (the “Objection”), seeking to disallow and expunge certain claims. The Objection was scheduled to be heard before this Court on February 1, 2024, at 11:00 A.M. (prevailing Eastern time).

**PLEASE TAKE FURTHER NOTICE** that, on January 18, 2024, the Debtors filed the *Notice of Adjournment of Debtors’ Eighteenth Omnibus Objection (Non-Substantive) to Certain Claims Pursuant to 11 U.S.C. § 502 and Fed. R. Bankr. P. 3007 (Co-Liability Contingent)* (ECF No. 1167) (the “Adjournment Notice”) adjourning the Objection to the February 8, 2024, omnibus hearing at 11:00 A.M. (prevailing Eastern time).

**PLEASE TAKE FURTHER NOTICE** that, on January 23, 2024, counsel for Claimant Soichiro “Michael” Moro, holder of the Moro Claims, filed a response to the Objection (ECF No. 1187) (the “Response”).

**PLEASE TAKE FURTHER NOTICE** that, on January 25, 2024, the Debtors filed the *Notice of (I) Adjournment of Debtors’ Eighteenth Omnibus Objection (Non-Substantive) to Certain Claims Pursuant to 11 U.S.C. § 502 and Fed. R. Bankr. P. 3007 (Co-Liability Contingent) Solely with Respect to Claim Nos. 375, 398 and 408 and (II) Extension of Response Deadline Solely with Respect to Claim Nos. 472, 483 and 501* (ECF No. 1193), that, solely with respect to the Moro Claims (i) adjourned the Objection to the March 6, 2024 omnibus hearing at 11:00 A.M. (prevailing Eastern time); and (ii) extended the deadline for the Debtors to file a reply, if any, to March 1, 2024.

**PLEASE TAKE FURTHER NOTICE** that, on February 28, 2024, the Debtors filed the *Notice of Further Adjournment of Debtors’ Eighteenth Omnibus Objection (Non-Substantive) to Certain Claims Pursuant to 11 U.S.C. § 502 and Fed. R. Bankr. P. 3007 (Co-Liability Contingent) Solely with Respect to Claim Nos. 375, 389, and 408* (ECF No. 1406), that, solely with respect to the Moro Claims (i) further adjourned the Objection to the April 16, 2024 omnibus hearing at 11:00 A.M. (prevailing Eastern time); and (ii) extended the deadline for the Debtors to file a reply, if any, to April 12, 2024.

**PLEASE TAKE FURTHER NOTICE** that, on April 11, 2024, the Debtors filed the *Notice of Further Adjournment of Debtors’ Eighteenth Omnibus Objection (Non-Substantive) to Certain Claims Pursuant to 11 U.S.C. § 502 and Fed. R. Bankr. P. 3007 (Co-Liability Contingent) Solely with Respect to Claim Nos. 375, 389, and 408* (ECF No. 1565), that, solely with respect to the Moro Claims (i) further adjourned the Objection to the May 8, 2024 omnibus hearing at 11:00 A.M. (prevailing Eastern time); and (ii) extended the deadline for the Debtors to file a reply, if any, to May 6, 2024.

**PLEASE TAKE FURTHER NOTICE** that, on April 17, 2024, the Debtors filed the *Notice of Filing of Stipulation and Order by and Among the Debtors and Soichiro “Michael” Moro* (the “Stipulation and Order”) (ECF No. 1590) that has been presented to the Court for signature and will adjourn the Objection *sine die* upon entry with respect to Claim Nos. 375, 398 and 408.

**PLEASE TAKE FURTHER NOTICE** that, as authorized by the Court, solely with respect to the Moro Claims, the Debtors hereby further adjourn the Objection to the June 20, 2024 omnibus hearing at 10:00 A.M. (prevailing Eastern time).

Dated: May 6, 2024  
New York, New York

/s/ Luke A. Barefoot  
Sean A. O’Neal  
Luke A. Barefoot  
Jane VanLare  
Thomas S. Kessler  
CLEARY GOTTlieb STEEN &  
HAMILTON LLP  
One Liberty Plaza  
New York, New York 10006  
Telephone: (212) 225-2000  
Facsimile: (212) 225-3999

*Counsel to the Debtors  
and Debtors-in-Possession*